

EXHIBIT 1-1

PII Redacted Pursuant to Fed. R. Civ. P. 5.2

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Meeting with Iraqi Embassy Regarding Litigation Volunteers**Overview:**

- You will meet Mohamed Jawad Al Quraishy, the Deputy Chief of Mission (DCM) of Iraq.
- This meeting is scheduled for Tuesday, January 09, 2018 at 11:00am local time at DHS Headquarter, 3801 Nebraska Ave NW, Washington, DC 20007
- ICE attendees: John Schultz, Deputy Assistant Director, Michael Bernacke, Unit Chief, Julius Clinton, Detention & Deportation Officer.
- In attendance from the Department of State Derek Hoffmann, Desk Officer for Iraq.
- Iraqi removals remain temporarily stayed by order of the United States District Court for the Eastern District of Michigan in *Hamama, et al. v. Adducci, et al.*, Case No. 2:17-cv-11910,
- **Vienna Convention** –Iraq is not a mandatory notification country.
- **International Civil Aviation Organization.** – Iraq is a party to Annex 9 to the Convention on International Civil Aviation.
- **Working Groups** –ICE ERO is not part of a working group involving Iraq.
- **Gift Exchange** – No gift exchange.

Discussion Points:

- Thank the DCM for meeting with you and thank them for their cooperation with interviewing subject scheduled to go on charters and issuance of travel documents to these subjects.
- We thank GoI for issuance of the travel documents they have provided for our previous charter mission. However, we request that travel document issuance occur in a timely manner to best facilitate orderly scheduling of future charter missions. We also request that, for aliens who indicate an unwillingness to return to Iraq, that travel documents still be issued to such aliens despite them expressing their reticence.
- You may wish to mention that ICE's goal is for the GoI to issue travel documents for Iraqi nationals within thirty days of request—as called for by Annex 9 to the International Civil Aviation Organization (ICAO), to which Iraq is a party (specific talking points follow):
 - Under international law every state is obliged to accept the return of all its respective nationals who are not eligible to remain in the United States, or any other country.
 - Just as we are, Iraq is a party to the ICAO. Annex 9 of the Convention provides for the issuance of travel documents for a state's nationals within 30 days of a request.

Background:

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ERO has upgraded Iraq from uncooperative at risk of being uncooperative country regarding their compliance with ICE/ERO's attempts to procure travel documents (TDs) for Iraqi nationals who have been ordered removed from the U.S.

Due to the lack of cooperation from the Iraq Embassy, Washington, D.C. on this issue, ERO and the Department of State developed a strategy to request approval for final order cases directly from Baghdad. In February 2017, ERO received confirmation from the U.S. Embassy in Baghdad that Iraqi officials have approved the acceptance of a Special High Risk Charter flight containing eight Iraqi detainees. These cases were approved and were removed. On April 19, 2017, ICE successfully completed the charter flight to Iraq since 2010.

On March 12, 2017, the Department of State issued a cable which summarized the outcomes of a meeting between the U.S. Embassy, Baghdad and the Iraq Ministry of Foreign Affairs (MFA). MFA informed the embassy representatives that an Iraq Inter-ministerial Committee of Deportation was formed and is comprised of representatives from the Prime Minister's Office, the Ministry of Foreign Affairs (MFA), the Ministry of Justice (MoJ), and the Ministry of the Interior (MoI). The Committee had identified four necessary steps for Iraq to facilitate deportation:

- Consular access - MFA indicated that they would like to meet with those being removed at the point of embarkation from the U.S.
- Citizenship verification- MFA indicated that the MOI would review and verify the evidence of citizenship provided by the U.S. ICE could use evidence of citizenship obtained from U.S. information systems in lieu of passports or national identity cards
- Deportation order review- MFA indicated that the MOJ would review each deportation order in tandem with the citizenship verification process.
- Travel document issuance- the Committee is prepared to inform the Iraqi Embassy and Consulates to provide travel documents for the 1,400 non-detained Iraqi nationals.

On May 25, 2017, in preparation for a removal flight, ICE transmitted 280 travel document requests to the U.S. Embassy in Baghdad for submission to the inter-ministerial committee of deportation. The removal flight is scheduled to arrive in Bagdad on June 29, 2017 with no more than 75 Iraqi nationals with final orders of removal on board.

Since May 15, 2017, 213 Iraqi nationals subject to a final order of removal have entered ICE custody all but four have criminal convictions.

A list of 280 travel document requests were submitted by ICE to the U.S. Embassy in Baghdad during a period covering May 17, 2017 through June 6, 2017. After a DOS review and follow up questions regarding several cases, DOS submitted all 280 cases with a Dip note to the Iraqi MFA on June 6, 2017.

ERO was notified on, June 21, 2017, that Iraq would not accept the charter scheduled to arrive on June 29, 2017.

On June 22, 2017, the U.S. District Court for the Eastern District of Michigan temporarily stayed the removal of 114 Iraqi nationals.

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On June 26, 2017, the U.S. District Court filed a ruling expanding the June 22 order to apply to 1,400 similarly situated Iraqis with final orders nationwide.

On July 5, 2017, the district court heard oral argument on two motions filed by plaintiffs – (1) to expedite briefing for a preliminary injunction motion and extend the temporary restraining order, and (2) to permit expedited class discovery.

There are currently 280 Iraqi nationals in ERO custody, under a final order of removal. ICE is waiting for approval of diplomatic note for a charter when the nationwide moratorium is lifted. There are a total of fifteen Iraqi subjects that have asked to be removed from the class action lawsuit:

Aliens removed from injunction and ICE is able to remove:

- A [REDACTED] S [REDACTED], N [REDACTED] - Subject scheduled for removal January 30
- I [REDACTED], W [REDACTED] - Pending removal scheduling.
- M [REDACTED] J [REDACTED] - Removal scheduled for January 25
- A [REDACTED] i, B [REDACTED] - Pending travel document
- D [REDACTED] A [REDACTED] S [REDACTED] - Pending travel document
- O [REDACTED] A [REDACTED] T [REDACTED] - Pending travel document
- R [REDACTED] G [REDACTED] - Pending travel document

Aliens pending exclusion from injunction who have volunteered to be removed:

- G [REDACTED] [REDACTED] A [REDACTED] - Pending travel document
- A [REDACTED] B [REDACTED] - Pending travel document
- A [REDACTED] K [REDACTED] - Pending travel document
- J [REDACTED] A [REDACTED] K [REDACTED] - Pending travel document
- J [REDACTED] A [REDACTED] D [REDACTED] - Pending travel document
- S [REDACTED] A [REDACTED] - Pending travel document
- Y [REDACTED] K [REDACTED] - Pending travel document
- A [REDACTED] J [REDACTED] S [REDACTED] - New case, will submit travel document request

The Iraqi Embassy in D.C. has jurisdictional responsibilities to issue travel documents for those Iraqi nationals under a final order in Alabama, Connecticut, Delaware, Florida, Georgia, Louisiana, Maine, Maryland, Massachusetts, Mississippi, New Hampshire, New Jersey, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Virginia and West Virginia.

Iraq is not a mandatory notification country.

Press:

This meeting is closed to the press.

Removal data as of December 23, 2018

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RCI data for Iraq – Iraq is listed as “ARON” for FY2017 under the Removal Cooperation Initiative Tool.

- As of FY2017 metrics note Iraq as considered “At Risk of being Uncooperative” with a Cooperation Score of 68.75 per below:
 - Grants Interview: Yes –
 - Accepts Charters: Yes – Charter Mission Meets Needs
 - Releases to Removals Ratio: 0.15
 - Average Time from Executable Final Order to Removal: 277.66 days

HIGHLY CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

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FY12 to FY17YTD Removal Statistics for Iraq

Country	Total					
	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017
Iraq	33	62	57	36	48	58

FY15-FY17 Average Length of Stay

Country	FY2015	FY2016	FY2017
Iraq	93	132.7	124

Currently Detained and Non-Detained Final Order Cases

Country	Currently Detained and Non-Detained with Final Order					
	Detained Criminal	Detained Non-Criminal Immigration Violator	<i>Total</i>	Non-Detained Criminal	Non-Detained Non-Criminal Immigration Violator	<i>Total</i>
Iraq	240	40	280	1000	120	1400

FY12 –FY17 Zadvydus Releases

Country	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017
Iraq	7	14	38	18	4	9

Attachments: Profile on Deputy Chief of Mission, Eight Voluntary Deportee Histories**Staff Responsible for Briefing Memo:** *Julius Clinton, DDO, RIO, 202-732-3521, Julius.A.Clinton@ice.dhs.gov*

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Iraqi Embassy

- Mohamed Alquraishi, DCM
- Yarub Al-Anpaqi, First Secretary
- Wathiq Alhammam, First Secretary
- Ahmed Utaifa, Second Secretary

DHS HQ

- Ken Holt, Director for Middle East Affairs
- Alex Kisselburg, Deputy Director for Middle East Affairs

ICE

- John Schultz, Deputy Assistant Director
- Michael Bernacke, Unit Chief
- Julius Clinton, Detention and Deportation Officer

Department of State

- Derek Hoffman, Political Unit Chief
- Kris Clark, Political Officer
- David Nobles, Deputy Director